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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

WILLIAM R. WATTS,

Plaintiff,

v.

MIDLAND CREDIT MANAGEMENT,
INC.,

Defendant.

Case No. 2:20-cv-00258-GMN-EJY

**STIPULATION OF EXTENSION OF
TIME TO RESPOND TO COMPLAINT**

[FIRST REQUEST]

This is the first stipulation of extension of time for Defendant Midland Credit Management, Inc. ("MCM") to respond to Plaintiff's complaint. In support of this stipulation, MCM states as follows:

1. MCM was served on February 11, 2020.
2. MCM promptly hired outside counsel, and MCM's outside counsel promptly contacted Plaintiff's counsel to discuss the Complaint and other background information. During that telephone call, MCM's counsel indicated to Plaintiff's counsel that MCM would be investigating allegations in the Complaint. Counsel for MCM also requested a settlement demand to explore the possibility of resolving this matter. MCM's counsel requested an extension of 30 days to respond to the Complaint so that MCM could complete its preliminary investigation

1 before either party devotes significant litigation expenses. Plaintiff's counsel agreed to that
2 request.

3 3. Accordingly, the parties stipulate that MCM shall have until up to and including
4 April 2, 2020 to move, plead, or otherwise respond to Plaintiff's complaint and that MCM is not
5 waiving any defenses or jurisdictional arguments by filing this stipulation of extension of time.

6 Dated: March 4, 2020

7 By /s/ John M. Naylor
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15 *Attorneys for Defendant Midland*
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17 IT IS SO ORDERED.

By /s/ Shawn W. Miller
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Attorneys for Plaintiff William R. Watts

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19 UNITED STATES MAGISTRATE JUDGE

20 DATE: March 5, 2020